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January 5, 2011

VIA FEDERAL EXPRESS

Maureen Hogel, Esq.
Chief Legal Officer
Highmark Blue Cross Blue Shield
of Pennsylvania
Fifth Avenue Place
120 Fifth Avenue
Pittsburgh, PA 15222-3099

Re: Failure to Pay Claims

Dear Ms. Hogel:

I write on behalf of our clients William Griffis and Pharmacy Matters, Inc. ("Pharmacy Matters") to demand immediate payment of the invoices that our clients have submitted regarding covered services that Highmark Blue Cross Blue Shield of Pennsylvania has not paid.

Our clients have followed the procedures set out by the Blue Cross Blue Shield Association for submission of claims, yet there are unpaid claims for covered products and services provided dating from October 2008 to December 2008 totaling \$330,318.00. I attach a schedule showing the amounts owed. As you can see from the schedule, these claims have been outstanding for more than two years. No legitimate reason has ever been provided to our clients for the delay.

We have engaged in exhaustive efforts over the last two years to resolve this situation with Wellmark Inc. as you know.

Highmark Blue Cross Blue Shield of Pennsylvania's actions are in violation of both the Employee Retirement and Security Income Act of 1974 and Pennsylvania law. Failing payment of the outstanding claims by January 12, 2011,



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our clients will exercise all legal and equitable remedies available to them, including but not limited to commencing litigation.

Please let me know your intentions.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Anthony Paduano".

Anthony Paduano

Inv #	Provider of Service	Date of Service	Amount Billed	Expected	Outstanding	Units Billed for Factor
15719	Pharmacy Matters	10/24/2008	\$ 108,908.85	\$83,997.00	\$83,997.00	62,220
16191	Pharmacy Matters	11/26/2008	\$ 105,125.99	\$81,081.00	\$81,081.00	60,060
16409	Pharmacy Matters	12/18/2008	\$ 107,100.00	\$82,620.00	\$82,620.00	61,200
16608	Pharmacy Matters	12/31/2008	\$ 107,100.00	\$82,620.00	\$82,620.00	61,200
TOTAL:					\$330,318.00	